

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,	§	CRIMINAL CASE NO.
	§	
v.	§	1:16-cr-00237-AT-JSA
	§	
JAMES G. MALONEY,	§	
	§	
Defendant.	§	

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**CONSENT MOTION FOR EXTENSION OF TIME  
AND TO RESET DEADLINES**

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COMES NOW, James G. Maloney, Defendant herein, by and through the undersigned counsel, and files this, his Consent Motion for Extension of Time and to Reset Deadlines, and respectfully moves this honorable Court to extend the time in which Defendant may file a perfected or supplemental “notice of intent,” and the time in which the Government may file a response to any perfected notice of intent, by approximately thirty (30) days, and to continue the status conference in this matter currently set for May 2, 2017, until a date after the filing of any response by the Government, showing as follows:

Defendant has submitted an initial “notice of intent” to the Court. *See* Docket # 24, 27, 34. On February 2, 2017, the Court held a status conference in this matter.

*See* Docket # 34. The Court directed Defendant to file a perfected or supplemental notice of intent by March 16, 2017, and directed the Government to file a response to the perfected or supplemental notice by April 17, 2017. *See id.* The Court scheduled an additional status conference in this matter for May 2, 2017, at 10:00 a.m. *See id.*

As the Court is aware, the submission of the notice of intent has resulted in the initiation of various processes and making of arrangements by the Department of Justice and the Court. These processes and arrangements have taken time, and have made necessary an extension of the time in which Defendant may file a perfected or supplemental notice, and in which the Government may file a response. Counsel has been informed that the arrangements will be complete as of March 10, 2017.

Defendant proposes that the Court grant him until and including Monday, April 17, 2017, in which to file a perfected or supplemental notice of intent. Defendant also proposes that the Government be granted until and including Monday, May 15, 2017, in which to file a response. Finally, Defendant proposes that the Court continue the status conference currently set for May 2, 2017, until a date after May 15, 2017. Counsel for Defendant has conferred with counsel for the Government, and has been orally informed that the Government consents to the

proposed extensions of time for the filing of the perfected or supplemental notice of intent and response, and to the continuance of the status conference.

WHEREFORE, Defendant James G. Maloney respectfully requests that this honorable Court grant his Consent Motion for Extension of Time and to Reset Deadlines, and (1) grant Defendant until and including Monday, April 17, 2017, in which to file a perfected or supplemental notice of intent; (2) grant the Government until and including Monday, May 15, 2017, in which to file a response; and (3) continue the status conference in this matter set for May 2, 2017, until after the filing of any response by the Government.

Respectfully submitted, this 9th day of March, 2017.

GILLEN WITHERS & LAKE, LLC

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Counsel for Dr. James G. Maloney

**CERTIFICATION**

The undersigned hereby certifies that he has conferred with opposing counsel for the United States of America in a good faith effort to resolve the subject-matter of this Motion by agreement, and that the parties have reached an agreement, pursuant to N.D.Ga.L.Crim.R. 12.1D. The undersigned further certifies, pursuant to N.D.Ga.L.Civ.R. 7.1D, that the foregoing document has been prepared with one of the font and point selections (Times New Roman, 14 point) approved by the Court in N.D.Ga.L.Civ.R. 5.1B.

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this 9th day of March, 2017, the undersigned served the foregoing document by filing the document via the Court's Case Management/Electronic Case Filing (CM/ECF) system, which will automatically serve notice of such filing on the following attorneys of record:

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